RECEIVED
CENTRAL FAX CENTER
SEP 01 2004

Fulcomer 5-3

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent Application

Applicants(s): Fulcomer et al.
Case: 5-3
Serial No.: 09/240,932
Filing Date: January 29, 1999
Group: 2663
Examiner: Chi Ho A. Lee

I hereby certify that this paper is being deposited on this date with the U.S. Postal Service as first class mail addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450
Signature: [signature] Date: June 29, 2004

Title: Application Module Interface for Bi-directional Signaling and Bearer Channels in a Private Branch Exchange (PBX) Environment

---

APPEAL BRIEF

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Applicants hereby appeal the final rejection dated February 12, 2004 of claims 1-16 of the above-identified application.

REAL PARTY IN INTEREST

The present application was initially assigned to Lucent Technologies Inc., as evidenced by an assignment recorded on April 5, 1999 in the United States Patent and Trademark Office at Reel 9889, Frame 0259. The present application was thereafter assigned to Avaya Technology Corp., as evidenced by an assignment recorded on March 21, 2002 in the United States Patent and Trademark Office at Reel 012707, Frame 0562. The assignee, Avaya Technology Corp., is the real party in interest.

RELATED APPEALS AND INTERFERENCES

There are no known related appeals or interferences.

STATUS OF CLAIMS

Claims 1 through 16 are pending in the above-identified patent application. Claims 1-16 remain rejected under 35 U.S.C. § 102(b) as being anticipated by Amada et al. (United States Patent Number 4,841,521).

STATUS OF AMENDMENTS

There have been no amendments filed subsequent to the final rejection.

SUMMARY OF INVENTION

The present invention is directed to an application module interface that allows one or more modules to access voice or data channels in a private branch exchange (PBX) environment that contains one or more B channels (bearer channels) for transmitting voice or data signals, and one or more D channels (signaling channel) for transmitting data. (Page 5, line 3, to page 6, line 16; page 10, line 4, to page 11, line 26.) The application module interface provides a control channel that allows a module to obtain and vary the status and configuration of a telephone terminal. (Page 11, line 26, to page 12, line 9.) The application module interface provides access to both directions of two B channels (B1 and B2) and one D channel. (Page 5, lines 23-30.)

ISSUES PRESENTED FOR REVIEW

Whether claims 1-16 are properly rejected under 35 U.S.C. § 102(b) as being anticipated by Amada et al.

GROUPING OF CLAIMS

The rejected claims stand and fall together.

ARGUMENT

Independent Claims 1, 6, 9, 13 and 16 are rejected under 35 U.S.C. § 102(b) as being anticipated by Amada et al.

Regarding claim 1, 9, 13, and 16, the Examiner asserts that Amada (FIG. 3) teaches receiving a frame format of FIG. 1a wherein each frame provides a channel for each direction of one B channel (col. 2, lines 58+) for transmitting data for the DTE (a single entity).

Applicants note that, Amada teaches that the data in each transmission period is either sent from Terminal Station A to Terminal Station B, or from Terminal Station B to Terminal Station A (see, FIGS. 1a, 2, 7, and 8; col. 3, lines 37-62). The packets sent in each direction, therefore, are from *different entities* (Terminal Station A and Terminal Station B). Independent claims 1, 6, 9, 13, and 16 require one or more channels corresponding to a communication, such that a *single entity places data from each of said directions* of said communication in a corresponding directional channel of a given frame.

As indicated in Applicants' prior response, FIG. 11, which illustrates the Bearer Channel Configurations, provides an example that illustrates the difference between the recited claim language and Amada. In FIG. 11, mode 0 identifies an application utilizing a recorder interface where voice paths, such as those from a telephone conversation, are sent and received from a line interface unit. In addition, copies of the received and transmitted voices are sent to a recorder module for recording the conversation. Thus, a single entity places data from *each direction* of a communication (the telephone conversation) in a corresponding directional channel of a given frame.

Thus, Amada et al. do not disclose or suggest one or more channels corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding directional channel of a given frame, as required by independent claims 1, 6, 9, 13, and 16.

Conclusion

The rejections of the independent claims under section §102 in view of Amada et al. are therefore believed to be improper and should be withdrawn. The remaining rejected dependent claims are believed allowable for at least the reasons identified above with respect to the independent claims.

The attention of the Examiner and the Appeal Board to this matter is appreciated.

Respectfully,

Date: June 29, 2004

Kevin M. Mason
Attorney for Applicant(s)
Reg. No. 36,597
Ryan, Mason & Lewis, LLP
1300 Post Road, Suite 205
Fairfield, CT 06824
(203) 255-6560

APPENDIX

1. An interface for accessing digital channels in a private branch exchange (PBX) environment, comprising:

a connector for connecting said interface to an application module; and

a receiver for receiving signals from said connector, said receiver using a frame format, wherein each frame in said frame format provides a channel for each direction of at least one bearer (B) channel corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding directional channel of a given frame.

2. The interface of claim 1, wherein said frame format provides at least four channels including two bearer channels in both directions.

3. The interface of claim 1, wherein said application module permits a computer device to access said digital channels.

4. The interface of claim 1, wherein said application module permits an analog device to access said digital channels.

5. The interface of claim 1, further comprising a connector for connecting said interface to a telephone terminal.

6. An interface for accessing digital channels in a private branch exchange (PBX) environment, comprising:

a connector for connecting said interface to an application module; and

a receiver for receiving signals from said connector, said receiver using a frame format, wherein each frame in said frame format provides a channel for each direction of at least one signaling (D) channel corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding

directional channel of a given frame.

7. The interface of claim 6, wherein said application module permits a computer device to access said digital channels.

8. The interface of claim 6, further comprising a connector for connecting said interface to a telephone terminal.

9. An interface for accessing digital channels in a private branch exchange (PBX) environment, comprising:

a connector for connecting said interface to an application module; and

a receiver for receiving signals from said connector, said receiver using a frame format, wherein each frame in said frame format provides a channel for each direction of at least one bearer (B) channel and at least one signaling channel (D) corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding directional channel of a given frame.

10. The interface of claim 9, wherein said frame format provides at least four channels including two bearer channels in both directions.

11. The interface of claim 9, wherein said application module permits an analog device to access said digital channels.

12. The interface of claim 9, further comprising a connector for connecting said interface to a telephone terminal.

13. A method for accessing digital channels in a private branch exchange (PBX) environment, comprising:

connecting an interface to an application module; and

receiving signals from said connector using a frame format, wherein each

frame in said frame format provides a channel for each direction of at least one bearer (B) channel corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding directional channel of a given frame.

14. The method of claim 13, wherein said frame format provides at least four channels including two bearer channels in both directions.

15. The method of claim 13, wherein said application module permits an analog device to access said digital channels.

16. A method for accessing channels in a private branch exchange (PBX) environment, comprising:

connecting an interface to an application module; and

receiving signals from said connector using a frame format, wherein each frame in said frame format provides a channel for each direction of at least one signaling channel (D) corresponding to a communication, such that a single entity places data from each of said directions of said communication in a corresponding directional channel of a given frame.